

**FILED**

FEB 07 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUIS GERARDO TREJO-  
ZAMBRANO,  
a/k/a "Goon,"  
LUIS ANTONIO SORIA,  
a/k/a "Sosa,"  
BRYAN ULYSSES MARTINEZ,  
a/k/a "Poloh,"  
DARMEL DASHUN BATEMON,  
JR.,  
a/k/a "Darmel Bateman,"

Defendants.

Case No. **24CR045 GKF**

INDICTMENT

[COUNTS ONE and THREE: 18  
U.S.C. §§ 933(a)(3) and 933(b) –  
Conspiracy and Attempt to Traffick  
Firearms;  
COUNT TWO: 18 U.S.C.  
§ 1201(a)(1) – Kidnapping;  
COUNT FOUR: 18 U.S.C.  
§§ 922(g)(1) and 924(a)(8) – Felon in  
Possession of a Firearm and  
Ammunition;  
COUNT FIVE: 26 U.S.C.  
§§ 5861(d) and 5871 – Possession of  
an Unregistered Silencer;  
COUNT SIX: 18 U.S.C.  
§§ 922(n) and 924(a)(1)(D) – Receipt  
of a Firearm While Under  
Indictment for a Felony;  
COUNTS SEVEN and EIGHT: 18  
U.S.C. §§ 922(n) and 924(a)(1)(D) –  
Transporting Firearms in Interstate  
Commerce While Under  
Indictment;  
Forfeiture Allegation: 18 U.S.C.  
§ 924(d)(1), 26 U.S.C. § 5872, and  
28 U.S.C. § 2461(c) – Firearms  
Forfeiture]

THE GRAND JURY CHARGES:

**COUNT ONE**  
**[18 U.S.C. §§ 933(a)(3) and 933(b)]**

On or about September 10, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, a/k/a “Sosa,” and **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” together with others known and unknown to the Grand Jury, knowingly conspired and attempted to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person in and affecting interstate commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

All in violation of Title 18, United States Code, Sections 933(a)(3) and 933(b).

**COUNT TWO**  
**[18 U.S.C. § 1201(a)(1)]**

On or about September 10, 2023, in the Northern District of Oklahoma, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, a/k/a “Sosa,” and **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” knowingly and unlawfully seized, confined, inveigled, kidnapped, abducted, carried away, and held for ransom and reward, and otherwise, E.D., a person known to the Grand Jury, and used the mail and any means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the offense.

All in violation of Title 18, United States Code, Section 1201(a)(1).

**COUNT THREE**  
**[18 U.S.C. §§ 933(a)(3) and 933(b)]**

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” together with others known and unknown to the Grand Jury, knowingly conspired and attempted to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person in and affecting interstate commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

All in violation of Title 18, United States Code, Sections 933(a)(3) and 933(b).

**COUNT FOUR**  
**[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]**

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowing he had previously been convicted of the following crime punishable by imprisonment for a term exceeding one year:

Possession of Drug Paraphernalia (Cocaine), Case No. CR-2022-01012, in the District Court of Coconino County, State of Arizona, on August 28, 2023, knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A Palmetto State Armory, Dagger Compact, 19 x 9mm pistol, serial number JJE37863;
2. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20; and
3. Assorted rounds of ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT FIVE**  
**[26 U.S.C. §§ 5861(d) and 5871]**

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowingly possessed a firearm, that is, a silencer which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

**COUNT SIX**  
**[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]**

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowing he was then under indictment for at least one of the following crimes punishable by imprisonment for terms exceeding one year:

1. Simultaneous Possession of Drugs and Firearms (Count One), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
2. Possession of Marijuana with Purpose to Deliver (Count Two), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
3. Fleeing- Felony Vehicle or Conveyance- Substantial Danger of Death (Count Three), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
4. Possession with Purpose to Deliver Methamphetamine, Cocaine, or Heroin (Count Four), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
5. Simultaneous Possession of Drugs and Firearms (Count One), Case No. 72CR-23-321, in the District Court of Washington County, Arkansas;
6. Possession of Controlled Substance- Meth or Cocaine (Count Two), Case No. 72CR-23-321, in the District Court of Washington County, Arkansas;
7. Theft by Receiving Firearm Under \$2,500 (Count Three), Case No. 72CR-23-321, in the District Court of Washington County, Arkansas;
8. Possession of Controlled Substance- Marijuana (Count Four), Case No. 72CR-23-321, in the District Court of Washington County, Arkansas; and
9. Possession of Marijuana with Intent to Distribute, Case No. CF-2023-0082, in the District Court of Delaware County, Oklahoma,

willfully received a firearm, that is, a Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).



**COUNT SEVEN**  
**[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]**

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS ANTONIO SORIA**, a/k/a “Sosa,” knowing he was then under indictment for the following crime punishable by imprisonment for a term exceeding one year:

Possession of Schedule II Controlled Substance, Case No. 72CR-23-75, in the District Court in and for Washington County, Arkansas

willfully transported in interstate commerce a firearm, that is, a Glock, Model 19, 19 x 9mm pistol, serial number BTWU743.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

**COUNT EIGHT**  
**[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]**

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **DARMEL DASHUN BATEMON, JR.**, a/k/a “Darmel Bateman,” knowing he was then under indictment for the following crime punishable by imprisonment for a term exceeding one year:

Manslaughter, Case No. 60CR-23-3725, in the District Court in and for Pulaski County, State of Arkansas,

willfully transported in interstate commerce the following firearms:

1. A Palmetto State Armory, Model PA-15, Multi caliber pistol, serial number SCD443583;
2. An Anderson Manufacturing, Model AM-15, Multi caliber pistol, serial number 22021725;
3. A Century Arms International, Model VSKA, 7.62 x 39mm pistol, serial number SV7P011101;
4. A Zastava, Model PAP M85 PV, 5.56 caliber pistol, serial number M85PV001787; and
5. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number 22PMD-28632.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

**FORFEITURE ALLEGATION**

**[18 U.S.C. § 924(d)(1), 26 U.S.C. § 5872, and 28 U.S.C. § 2461(c)]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” and **DARMEL DASHUN BATEMON, JR.**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offenses. The property to be forfeited includes, but is not limited to:

**FIREARMS AND AMMUNITION**

1. A Palmetto State Armory, Dagger Compact, 19 x 9mm pistol, serial number JJE37863;
2. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20;
3. A Walther, IWI Uzi, .22 caliber rifle, serial number WI018714;
4. A Glock, Model 19, 9 x 19mm caliber pistol, serial number BTWU743;
5. A Palmetto State Armory, Model PA-15, multi caliber pistol, serial number SCD443583
6. An Anderson Manufacturing, Model AM-15, Multi caliber pistol, serial number 22021725;
7. A Century Arms International, Model VSKA, 7.62 x 39mm pistol, serial number SV7P011101;

8. A Zastava, Model PAP M85 PV, 5.56 caliber pistol, serial number M85PV001787;
9. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number 22PMD-28632;
10. Any ammunition or magazines not specified; and

**CURRENCY**

11. Approximately \$3,549 in United States currency.

All pursuant to Title 18, United States Code, Section 924(d)(1), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON  
United States Attorney

A TRUE BILL

  
KENNETH ELMORE  
Assistant United States Attorney

/s/Grand Jury Foreperson  
Grand Jury Foreperson